

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, *et al.*,
individually and on behalf of a class of all others
similarly situated,

Plaintiffs,

v.

CITY OF BUFFALO, N.Y., *et al.*,

Defendants.

No. 1:18-cv-00719-CCR

**DECLARATION OF CLAUDIA WILNER IN FURTHER SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

CLAUDIA WILNER declares under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Director of Litigation and Advocacy of the National Center for Law and Economic Justice ("NCLEJ"), which serves as counsel to the Plaintiffs in this action together with co-counsel Center for Constitutional Rights ("CCR"), the Western New York Law Center ("WNYLC"), and Covington & Burling LLP ("Covington").
2. I make this declaration in further support of Plaintiffs' motion for class certification pursuant to Rule 23 of the Federal Rules of Civil Procedure.
3. Attached as Exhibit A is a true and correct copy of the Supplemental Expert Report of Professor David Bjerk served on August 9, 2024. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: August 9, 2024

s/ Claudia Wilner

Claudia Wilner